REMARKS

Originally filed claims 1-26 were rejected.

Claims 1, 4, 5, 11, 12, 15, 17, 22, and 23 have been amended.

Claims 3 and 19 have been cancelled.

Applicants acknowledge receipt of the Examiner's Office Action dated May 1, 2006. All originally filed claims were rejected in the Office Action. Specifically, claims 1-6, 13, 16-21, 24 and 26 were rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,668,304 issued to Satran et al. ("Satran"). Claims 7-10, were rejected under 35 U.S.C. § 103 as being unpatentable over Satran in view of us U.S. Patent Application Publication No. 2004/0098544 filed by Gaither et al. ("Gaither"). Lastly, claims 11-12, 14-15, 22-23, and 25 were rejected under 35 U.S.C. § 103 as being unpatentable over Satran and U.S. Patent No. 6,128,627 issued to Mattis et al. ("Mattis"). In light of the foregoing amendments and following remarks, Applicants respectfully request the Examiner's reconsideration and reexamination of all pending claims.

Originally filed claims 1 and 3 stand rejected under 35 U.S.C. § 102 as being anticipated by Satran. Claims 1 and 3 in combination recite a generation of first and second write transactions comprising first and second tags, respectively. Additionally, claim 3 requires each of the first and second write transactions to comprise the same data D. In rejecting claim 3, the Office Action asserts that column 5, lines 8-11 of Satran teaches first and second write transactions which comprise the same data D to be written. Column 1, lines 7-11 recite:

Further, preferably, one of the data structures includes a translation table which maps logical block addresses of the succession of data blocks to respective physical addresses and which tags which of the data blocks is currently engaged in an open data transaction.

Column 5, lines 7-11 of Satran teaches a data structure that includes a translation table for mapping logical block addresses to physical addresses and which tags which of the data blocks is currently engaged in an open data transaction. This cited section of Satran does not teach or fairly suggest first and second write transactions comprising the same data D to be written, either alone or in combination with the remaining limitations of originally filed dependent claim 3. As such, Applicants assert that originally filed dependent claim 3 is patentably distinguishable over the cited section of Satran.

Originally filed independent claim 1 was rejected as being anticipated by Satran.

Applicants have amended claim 1 to include features of originally filed dependent claim 3.

Independent claim 1 now recites that the first and second transactions comprise the same data D.

For the reasons set forth above, Applicants assert that independent claim 1 is now patentably distinguishable over Satran.

Independent claim 15 has been amended and now recites the first and second write transactions comprise the same data D. Independent claim 17 has been amended to recite that the first and second write transactions comprise the same data D. Lastly, independent claim 25 has been amended and now recites that the first and second write transactions comprise the same data D. Each of these independent claims recite the same feature set forth in amended independent claim 1. For the reasons set forth above, Applicants assert that these independent claims are likewise patentably distinguishable.

PATENT

The remaining claims depend directly or indirectly from independent claims 1, 17, or 25. Insofar as these independent claims have been found to be patentably distinguishable, it follows that the remaining claims are likewise patentably distinguishable.

Independent claim 26 also recites first and second transactions that comprise the same data D.

CONCLUSION

Applicant(s) submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria

Virginia, 22313-1450, on June 16, 2006.

Attorney for Applicants

Date of Signature

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